

ERIC G. MOSKOWITZ  
NANCY E. KESSLER PLATT  
DAWN L. GOLDSTEIN  
National Labor Relations Board  
1099 14th Street, NW, Suite 8600  
Washington, DC 20570  
Telephone: 202 273-2930  
Facsimile: 202 273-1799  
Email: [Eric.Moskowitz@nrb.gov](mailto:Eric.Moskowitz@nrb.gov)  
Email: [Nancy.Platt@nrb.gov](mailto:Nancy.Platt@nrb.gov)  
Email: [Dawn.Goldstein@nrb.gov](mailto:Dawn.Goldstein@nrb.gov)

OLIVIA GARCIA  
KATHLEEN C. SCHNEIDER, Bar No. 174058  
NLRB, Region 20  
901 Market Street, Suite 400  
San Francisco, CA 94103-1735  
Telephone: 415 356-5130  
Facsimile: 415 356-5156  
Email: [Olivia.Garcia@nrb.gov](mailto:Olivia.Garcia@nrb.gov)  
Email: [Kathleen.Schneider@nrb.gov](mailto:Kathleen.Schneider@nrb.gov)

Counsel for Defendants Norelli, et al.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

1 Plaintiff Service Employees International Union, Local 790, and Defendants Joseph  
2 Norelli, Regional Director for Region 20 of the National Labor Relations Board and the  
3 individual Members of the National Labor Relations Board (collectively, "the Board" or "the  
4 NLRB"), by and through their respective undersigned counsel, pursuant to Local Rule 6-2,  
5 N.D.Cal., hereby STIPULATE AND AGREE as follows:

6 1. This Court has issued an Order to Show Cause regarding Plaintiff's Motion for a  
7 Preliminary Injunction, and set a hearing on that Motion for June 27, 2007, at 9:00 a.m (Docket  
8 No. 18). The Board has opposed Plaintiff's Motion for Preliminary Injunction on grounds of  
9 lack of subject matter jurisdiction (Docket No. 14). For this same reason - lack of jurisdiction -  
10 the Board is filing the accompanying Motion to Dismiss Complaint. Thus, it will serve the  
11 interests of judicial economy and the economy of the parties (particularly the Board, whose lead  
12 counsel is in Washington, D.C.) to have the Motion to Dismiss heard at the same time as the  
13 Motion for Preliminary Injunction.

14 2. Plaintiff's Opposition to the Board's Motion to Dismiss will be filed by June 13, 2007,  
15 and the NLRB's Reply will be filed by June 20, 2007.

16 3. One previous time modification has been sought in this case. Proposed Intervenor  
17 Stephen J. Burke, Jr., has filed a Motion to Shorten Time (Docket No. 19), in order that his  
18 intervention motion may also be heard on June 27, 2007. Proposed Intervenor Burke has also  
19 agreed to the briefing and hearing dates set out in this stipulation.

20 4. The Court has issued an order setting the case management conference for September  
21 6, 2007 (Docket No. 21). The requested time modification would therefore have no effect on the  
22 schedule for this case.

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3 /s/ David A. Rosenfeld  
4 VINCENT A. HARRINGTON, JR., Bar No. 071119  
DAVID A. ROSENFELD, Bar No. 058163  
ERIC M. BORGERSOHN, Bar No. 177943  
WEINBERG, ROGER & ROSENFELD  
1001 Marina Village Parkway, Ste. 200  
Alameda, CA 94501-1091  
Tel: (510) 337-1001  
Fax: (510) 337-1023

1  
2  
3 ERIC G. MOSKOWITZ  
4 Assistant General Counsel  
National Labor Relations Board  
Special Litigation Branch  
1099 14th Street, NW  
Washington, DC 20570  
Tel: (202) 273-2930  
Fax: (202) 273-1799

5  
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7  
8 Counsel for Plaintiff SEIU, Local 790

9 /s/Nancy E. Kessler Platt  
10 NANCY E. KESSLER PLATT  
Supervisory Attorney

11 Dated: June 6, 2007

12 DAWN L. GOLDSTEIN  
Senior Attorney  
Tel: (202) 273-2936

13 OLIVIA GARCIA  
14 Regional Attorney  
National Labor Relations Board –  
Region 20  
901 Market Street, Suite 400  
San Francisco, CA 94103  
Tel: (415) 356-5151  
Fax: (415) 356-5156

15 KATHLEEN C. SCHNEIDER No.  
16 174058  
17 Attorney – Region 20  
18 Tel: (415) 356-5157

19 Counsel for Defendants Norelli, et al.

20 Dated: June 6, 2007